

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0618

Comment submitted by Jodi L. Reese, CET Engineering Services

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## Submitter Information

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## General Comment

EPA cannot provide "Reasonable Assurance" that placing significantly lower limits on point sources (with many industrial point sources below the limit of technology) will be implemented and successful.

Just because EPA has placed severely low nitrogen and phosphorus limits for point sources into the model and the model results show that Pennsylvania's allocations for nutrients can be met, does not provide "Reasonable Assurance" that this approach will be successful. Just because EPA can place these low limits in NPDES permits, does not mean that there is "Reasonable Assurance" that this approach will be successful.

This approach nets a fraction of the needed reductions from Pennsylvania and carries a huge financial burden to the rate-paying public. More Draconian is that many of the industrial point sources are listed as having nutrient limits that appear to be arbitrary and are well below the limit of technology. This approach exacerbates the unstable economic conditions that exist today. This approach will likely lead to multiple legal actions that will result in significant delays to the restoration of the Bay.